



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd Floor
New York, New York 10007*

May 5, 2022

By ECF and Email

(CronanNYSDChambers@nysd.uscourts.gov)

Hon. John P. Cronan

500 Pearl Street

New York, NY 10007

Re: *W.P.V. and W.P.O. v. United States, et al.*, No. 21 Civ. 4436 (JPC)

Dear Judge Cronan:

This Office represents Defendant the United States (“Defendant” or the “Government”) in the above-referenced case, which Plaintiffs bring pursuant to the Federal Tort Claims Act (“FTCA”). Defendant’s response to Plaintiffs’ complaint is due on May 9, 2022. In accordance with the Court’s individual practices, Defendant intends to submit a pre-motion letter to the Court on May 9, in connection with its anticipated motion to transfer or dismiss this case. Defendant writes respectfully to request that it be permitted to file a pre-motion letter up to five pages in length (rather than the three-page maximum permitted by the Court’s individual rules). Defendant requires these additional pages to properly set forth the bases for its two separate motions (the transfer motion and the motion to dismiss). All parties consent to this request.

Additionally, there is an initial conference scheduled for May 17, 2022. According to the Court’s individual rules, the parties must submit a letter and case management plan in advance of that conference. In light of the anticipated motion practice, the parties respectfully request that they be relieved of the obligation to file these two documents.

The Government thanks the Court for its consideration of this matter.

Page 2 of 2

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

/s/ Alexander J. Hogan
ALEXANDER J. HOGAN
REBECCA R. FRIEDMAN
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2799/2614
E-mail: alexander.hogan@usdoj.gov
rebecca.friedman@usdoj.gov